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**From:** Victorine, Gary  
**Sent:** Tue 5/6/2014 9:49:50 PM  
**Subject:** OECA End-of Year Projections of Compliance and Enforcement

Hi Alan/Andy

Not sure of your desired format for projections of enforcement accomplishments by end of year. Here is a chart format with concise narratives.

Red indicates where we think the “Mid-Year Data Analysis” chart is in error

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## **RCRA-C Compliance and Enforcement Program**

### **OECA Targets for FY14**

	FY14 Target	Mid Year	Projected End-of-Explanation
		Year	
RCRA-C Inspections	175	44	168 Mid-year accomplishments are low due to unusual winter, plus October shutdown which also impacted targeting. We are proposing a slightly lower EOY target due to loss of one primary inspector to a detail.
Judicial Referrals	1	0	1 Waste Management, Wisconsin, <b>two sites</b> ; referral signed 4/24/14. Also, we expect Chemical Solvents referral in FY14, but this will be a joint referral with the air program, so we might not get credit for it.
Complaints	13	4	11 Original target was based on previous years' accomplishments, but there ultimately were not
Penalty Orders	13	3	11

Penalty Orders	13	3	11
Consent Decrees	0	0	0
Admin Orders	0	0	0
SEPs	3	0	1

enough sites in the pipeline to support this CAFO target in FY14, partly due to furloughs and shutdowns in calendar year 2013, and our decision to refer two cases (total of three sites) to DOJ.

Even though we have been including language about the availability of SEPs in every Notice of Intent to File a complaint, industry has seemed disinterested in SEPs, and would seemingly rather just sign a check. Industry needs more incentive.

### **RCRA-I (“UST”) Compliance and Enforcement Program**

#### **OECA Targets for FY14**

	FY14 Target	Mid Year	Projected End-of-Year	Explanation
UST Inspections	144	19 USEPA + 40 fed credentialed Tribal  TOTAL = 59	144	Mid-year accomplishments low due to unusual winter, as well as October shutdown. Tribal inspections kept pace because DITCA grantees continued work during EPA shutdown
Judicial Referrals	0	0	0	
Complaints	2	0	1	Meleen CAFO issued in March 2014 did not include complaint (complaint had been issued at the very end of FY13). Expect IN-DOC CAFO to include complaint, for issuance in FY14
Penalty Orders	10	4	10	As of 5/1/14, we have issued one CAFO (Meleen) plus six expedited settlements/field citations. Expect one more CAFO (IN-DOC), and also expecting very active EPA inspecting in June/July, should get between two and five more UST-ESAs
Consent Decrees	0	0	0	
Admin Orders	0	0	0	

SEPs	2	0	1	Expect IN-DOC CAFO to include SEP for EMS at over one hundred DOC facilities.
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